Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of	**)**	**WT Docket 05-235**
Amendment of Part 97 of the	**)**	
Commission's Rules to Implement	**)**	
WRC-03 Regulations Applicable to	**)**	
Requirements for Operator Licenses	**)**	
in the Amateur Radio Service.	**)**	

Comments Regarding the Notice of Proposed Rule Making and Order Adopted July 15, 2005.

I, Albert J. Schramm, W3MIV, am a licensed amateur radio operator. I enjoy no position or privilege beyond that of any other radio amateur of my license class. The statements I put forth in this comment are my own, and they do not necessarily reflect the views of any other amateur radio licensee, nor those of any group or coalition.

Introduction

In the following, I shall refrain from belaboring this issue by freighting this document with myriad citations and footnotes quoting the Commission's own documents. Suffice it must that I employ the minimum citation that will prove clear to the thesis presented.

Given the firm language of the NPRM herein cited, I will offer no rebuttal to the decision to drop any and all requirements for Morse code testing in the Amateur Radio Licensing regulations and procedures for the United States and for those possessions under regulation by the FCC. The stated objective is clearly consonant with the trend now sweeping most of the rest of the world, and it must be viewed as having been the desire of the WRC-03 conference when it issued its final reports now nearly two years ago. When all is said and done, I believe the decision made by the Commission will prove to have been a good one. However, such a drastic revision of the rules and procedures will have consequences in other areas of the Part 97 Regulations that should be addressed in any final R&O that may be issued by the Commission.

Discussion

The removal of Element 1 as a test requirement for an Amateur Radio License will result, over time, in an ever larger pool of operators to whom the Morse code is an unintelligible language. This will present a growing problem with regard to

the identification of stations as mandated by §97.119 of the Commission's rules. In the interest of preserving standards of "good amateur practice" this section needs to be revised to take into account the changing environment in which many new licensees will find themselves operating.

The anticipated influx of new licensees on the high frequency bands, most especially now that Morse code capability is not to be mandatory, will likely be concentrated on the phone bands, and possibly also in those bands devoted to the use of newer sound-card digital modes. To continue to permit CW identification on phone allocations, either by hand or by machine, will result in increased confusion and frustration, and the whole purpose of identification will thus be undermined and rendered useless. This is easily prevented by requiring clear voice identification in those bands devoted to the phone modes.

The current practice of using automated systems employing Morse code to identify repeaters is currently augmented on many machines by the inclusion of a voice identification as well. This is a practice that should be encouraged. Similarly, in some data modes or digital modes that are not readily decipherable by ear, the continuation of Morse code identification is a sensible solution and should be encouraged. This would prove particularly pertinent to those digital/data modes, such as Pac-TOR, G-TOR, and Clover, that require the use of proprietary hardware for deciphering and also present the potential for increased interference as more Licensees attain High Frequency privileges. It must be recognized, however, that the continued use of Morse code for identification will, itself, pose a growing problem over time as fewer and fewer Amateur Licensees learn and use that mode.

Recommendation

I suggest the *minimum* following changes, as highlighted in bold italic type below, to be made to §97.119 and included in the subsequent R&O:

> **§97.119 Station identification.**
>
> (a) Each amateur station, except a space station or tele-command station, must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every ten minutes during a communication, for the purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions. No station may transmit unidentified communications or signals, or transmit as the station call sign, any call sign not authorized to the station.
>
> (b) The call sign must be transmitted with an emission authorized for***, and appropriate to,*** the transmitting channel in one of the following ways:

(1) By a CW emission ***when operating in CW or any digital mode.*** When keyed by an automatic device used only for identification, the speed must not exceed 20 words per minute;

(2) By a phone emission in the English language ***when operating a voice mode in any phone band.*** Use of a standard phonetic alphabet as an aid for correct station identification is encouraged;

(3) ***By a RTTY or other digital emission using a specified digital code when all or part of the communications are transmitted by a RTTY or other data emission;***

(4) By an image emission conforming to the applicable transmission standards, either color or monochrome, of §73.682 (a) of the FCC Rules when all or part of the communications are transmitted in the same image emission.

Conclusion

The decision to remove the mandate for Morse code testing is a controversial one, and it will generate many negative comments in the Amateur community as this NPRM moves toward R&O. This will not be the first controversial decision made by the Commission since its inception. Indeed, the history of radio communications regulation over the past six decades is fraught with many such decisions. Technologies change with time, and regulations must be adapted to fit the times. That is as it should be, as it must be if we are to continue to move forward.

As we do so, however, we must not leave as important a regulatory requirement as clear and easily understandable station identification anchored to a language and system that will only become more arcane and opaque in the years ahead.

Thank you for the privilege of making my views in this matter known.

Sincerely,

Albert J. Schramm, W3MIV